

From: [MCCLINCY Matt](#)
To: [Eric Blischke/R10/USEPA/US@EPA](#)
Cc: [ANDERSON Jim M](#)
Subject: RE: TZW Meeting
Date: 07/26/2007 11:40 AM

Thanks Eric.

-----Original Message-----

From: Blischke.Eric@epamail.epa.gov
[mailto:Blischke.Eric@epamail.epa.gov]
Sent: Thursday, July 26, 2007 10:39 AM
To: MCCLINCY Matt
Subject: Fw: TZW Meeting

Matt, here is my summary of the status of TZW. This email represents a draft EPA position on TZW issues. Manganese, as well as other elements are described below.

Eric

----- Forwarded by Eric Blischke/R10/USEPA/US on 07/26/2007 10:37 AM -----

Eric Blischke/R10/USE PA/US	To
06/26/2007 02:17 PM	Chip Humphrey/R10/USEPA/US cc Rene Fuentes/R10/USEPA/US@EPA, Kristine Koch/R10/USEPA/US@EPA Subject TZW Meeting

Chip, here is where I think we are regarding TZW.

Loading: Based on my conversations with Rene, he does not feel that any sampling is needed for the loading analysis for the following reasons:
1) The loading for the hydrophobic PBTs that we are most concerned about from the stand point of load are not likely to be a big source to the river; 2) the collection of additional data to verify this is unlikely to reduce the uncertainty in the loading estimate and 3) there are practical limitations associated with measuring PBTs in TZW or porewater.

Manganese: The LWG's analysis shows that the conditions favoring dissolution of manganese other metals (iron, arsenic, barium) exist in Portland Harbor. However, they have not made a compelling case that the condition is natural and not associated with contamination. There is also a large degree of variability in the concentration range of manganese in TZW that makes drawing conclusions difficult. Further evaluation of this issue may be able to proceed without the collection of additional data. If we need additional data to tease this out, I am not sure what it is.

New Sites: We will discuss Gunderson, Willbridge and Rhone Poulenc on a site by site basis tomorrow. Our position is that the data is not needed for source control but rather to support the in-water risk assessment and feasibility study.

PEO: PEO has maintained that they are not responsible for the contamination at their facility and that Time Oil, the party that caused the contamination according to PEO, should perform the necessary work. On Monday, DEQ informed PEO that they will not be ordering Time Oil to do the required upland source control work. According to Keith Johnson, PEO indicated a willingness to complete the upland source control work. However, we will not have the results of this work until this year's field season has gone by. While PEO is not a big deal site, we may want to have the LWG do work off shore of this facility to avoid potential schedule slippage. It could be that the additional work done by PEO may obviate the need for this work but I am not sure it is worth the risk.

Data Gaps Decision Framework: The LWG may agree to the decision framework but they believe that it is conservative and do not want to necessarily be held to application of these criteria on a point by point basis in TZW as performance standards. I would like the ability to determine, on a case by case basis that depends on the nature of the remedy selected, the chemicals and pathways of concern, the results of the Portland Harbor risk assessment and any determinations about the application of ARARs, the extent we will use these criteria as performance standards. If we can not reach some sort of agreement on this point, we will have to spend a substantial amount of time determining what data we want, where and why and will not likely be able to complete this work this year.

Let me know if you have any questions,

Thanks, Eric